

**SHER TREMONTE LLP**

December 8, 2015

**BY CM/ECF**

The Honorable P. Kevin Castel  
United States District Judge  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Galanis, et al.*, 15-CR-643

Dear Judge Castel:

I write on behalf of our client, Gary Hirst, to respectfully request that his release travel restrictions be modified to allow him to travel to the Northern and Southern Districts of Florida and the Middle District of Tennessee on business.

On or about September 21, 2015, Mr. Hirst was indicted in the Southern District of New York in connection with this matter, and was arrested on or about September 25, 2015. On that date, Mr. Hirst was released on a \$1 million bond (which was subsequently secured by a \$200,000 cash deposit) and his travel was restricted to the Southern and Eastern Districts of New York, the Middle District of Florida, the District of Arizona and the Northern District of Georgia.

We respectfully request that Your Honor modify Mr. Hirst's travel restrictions to allow him to travel to the Northern and Southern Districts of Florida and the Middle District of Tennessee. In the coming weeks, Mr. Hirst has business-related meetings he would like to attend in Tallahassee, FL, Miami, FL, and Nashville, TN. He anticipates that he will likely have follow-up meetings in these jurisdictions in the coming months.

I have discussed this matter with Assistant U.S. Attorney Brian Blais and U.S. Pretrial Services Officer Bernisa Mejia. AUSA Blais consents to the requested travel modification. Officer Mejia spoke with Mr. Hirst's Pretrial Services Officer in the Middle District of Florida, and has advised that Pretrial Services has no objection to the proposed modification. If this request is approved, Mr. Hirst will provide Pretrial Services with itineraries for any travel.

Respectfully submitted,



Noam Biale

cc: All counsel of record (via ECF)  
U.S. Pretrial Services (via email)